

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	No. 16 CR 462-1
)	
VS.)	Hon. Rebecca R. Pallmeyer,
)	Judge Presiding.
PIERE PAOLO GENNELL,)	
Defendant.)	

**DEFENDANT PIERE PAOLO GENNELL'S MOTION FOR
APPOINTMENT OF A SECOND ATTORNEY UNDER THE CRIMINAL
JUSTICE ACT 18 U.S.C. SECTION 3006A et. al.**

Now comes the defendant, Piere Paolo Gennell, by and through his appointed counsel Mark Kusatzky, to request that this Court appoint Richard S. Kling pursuant to the Criminal Justice Act as additional counsel for Mr. Gennell.

In support of this motion Mr. Gennell states as follows:

1. That counsel was previously appointed, pursuant to the Criminal Justice Act, to represent Mr. Gennell.
2. That this matter is currently set for trial in July. The prosecution will involve multiple cooperating witnesses, voluminous audio and visual evidence, law enforcement personnel and various other witnesses. The trial could last the entire month. Counsel has reviewed over 200 media disks and thousands of pages of discovery.
3. Additionally Mr. Gennell has many issues regarding what work needs to be done in the future to prepare for trial. Said requests are numerous and time consuming. Attention paid

to client issues divides this attorney's time away from trial preparation just based upon the discovery presented. All issues raised by Mr. Gennell must be given the proper time.

4. Given the approaching deadlines and increased time needed for trial preparation this attorney believes that the appointment of a second attorney will aid in the effective representation of the client and keep the matter on schedule. The client's numerous issues can also receive the proper attention.

5. Under the CJA, Section 3006A (e) this Court has the power to grant the defense "other services" upon request. Said request will aid in the providing of effective assistance of counsel to Mr. Gennell. Counsel makes this request understanding that a schedule for litigation previously set.

6. Counsel has spoken to Richard S. Kling, a CJA panel attorney, and he has agreed to be the appointed counsel should this Court approve. Counsel has also followed protocols of contacting the Federal Defender's Program regarding the appointment of additional counsel.

.

WHEREFORE, Piere Paolo Gennell requests that the motion be granted.

Respectfully submitted,

/s/ Mark H. Kusatzky

181 Waukegan Road, Suite 306
Northfield, Illinois 60093
847-441-9050